

Privacy Policy

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The original version of this document is in French (France). In the event of a conflict between the translation of this document and the original version, the original version will prevail over any other version.

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1. Definitions

When We use capitalized terms in this Policy, We are referring to the following definitions:

« **Application** » means Glowbl's mobile application, available for download in the Apple App Store and the Google Play Store.

« **Policy** » means this Privacy Policy.

« **Information** » means any personal data about you, whether this Information can be used to identify you directly or indirectly.

« **We** », « **Us** », « **Our** », and « **Glowbl** » mean Our company, Glowbl, a simplified joint-stock company (*société par actions simplifiée*) with share capital in the amount of €32,252, registered with the Lyon Corporate Register under company number (*SIRET*) 535 328 694 and headquartered at 19 boulevard Eugène Deruelle, 69003 Lyon, France.

« **Services** » means online video conferencing services provided by Glowbl through its Application or its Website.

« **Third-Party Services** » means services, software, applications, or APIs supplied to Glowbl by third-party companies and usable or compatible with Glowbl's Services. For instance : Microsoft Teams, Google Drive, Miro, Draft, Youtube, Vimeo.

« **Website** » means the website accessible using the domain name glowbl.com.

« **Administrator** » means an individual who organizes a session on a space and invites you to join it, or a legal entity to which you belong or with which you are associated (such as your employer, your university, your training center, your facilitator or any other organization) that is separate and distinct from Glowbl and that has entered into a contractual agreement with Glowbl to authorize you to use Our Services.

« **Virtual Space** » means a videoconferencing space on Glowbl.

« **Space Data** » means the data exchanged during a session in a Virtual Space, whether it consists of video, image, sound, messages, or files and/or personal data about you.

2. When does this Privacy Policy not apply?

This Policy explains to you the reasons and the way in which Glowbl uses your Information, for its own needs (when we act as data controller).

This Policy does not apply:

- to the processing that the Administrator takes the initiative to carry out on his Space nor to the decisions that he takes concerning your account and your access to his Space (it is up to the Administrator to inform you of his processing with his own privacy policy);
- to the processing carried out by the publishers of the Third-Party Services (it is their responsibility to inform you of their processing with their own privacy policy).

3. How can I contact you?

If you have any questions regarding your Information, please contact us by one of the following means:

By mail: GLOWBL, Attn. Data Protection Officer, 19 Boulevard Eugène Deruelle 69003 LYON - France

By email: *contact-dpo@glowbl.com*

Please note that We can only answer questions or requests to exercise rights that concern this Policy. For further information, see Section “2. When does this Privacy Policy not apply?”.

4. What information do We collect about you?

We use Information that you provide to us directly as well as Information collected indirectly:

Information about you (Customer or Prospect)	First and last name, email address, company name, type of company, position in the company, country, needs expressed, offers that interest you, comments and questions submitted.
Information related to your account:	Email, username, password, first and last name, avatar, your contacts, your access rights and privileges, etc.
Information related to your subscription:	Subscription type, payment information, Administrator attached to your account, etc.
Space broadcasts:	Voice and video, instant messages.
Metadata:	Data that is created when you use Our Services, such as the names of the LiveStages you create, the user you invite, privacy settings, activity timestamps, the number of LiveStages created, the number of LiveStage creators, etc.
Connection data:	Connection logs, IP address, web browser used, timestamps, referrer, etc.
Information about your device configuration:	Your operating system, the brand/model of your device, display resolution, etc.
Information collected from Third-Party Services	Any information that you decide to share with Us via Third- Party Services (such as the list of your contacts, etc.)
Information collected using cookies	For further information, see Section “13. Do you use cookies?”.

5. Why is it mandatory to provide some Information?

Sometimes We have a real need for your Information. Failure to provide us with mandatory information may have consequences: We will not be able to create your account, We will not be able to provide you with the Service concerned, etc.

When information is mandatory, We explain why We need it near the collection field.

6. What do you use my Information for?

We use your Information for a number of purposes, which fall into the following categories:

- We may need your Information to provide Our Services (**Contract performance**);
- We may need your Information to comply with a legal obligation (**Legal obligation**);
- We may have a legitimate interest in using your Information (**Legitimate interest**);
- We use your Information because We have obtained your consent (**Consent**).

Providing Our Services	Contract performance
Customer relations, subscription management, and invoicing	Contract performance
Satisfaction surveys	Legitimate interest
Usage statistics for Our Services	Legitimate interest
Answering your questions	Legitimate interest
Handling your complaints or requests to exercise your rights	Contract performance legal obligation
Sending activity notifications by email	Legitimate interest
Sending Our newsletter	Consent
Sending emails informing users of how Glowbl works, tutorials for Our Services	Legitimate interest
Sending you business offers related to the Services you already use	Consent
Sending you business offers from Our business partners	Consent
Keeping Our Services safe and updated	Legitimate interest
Keeping connection logs	Legal obligation

7. How long do you store my Information?

We store your Information for periods that vary according to the purpose for which We collect it:

- **Information about your customer relationship with Us** is stored for 3 years following the end of Our business relationship
- **Information associated with your Glowbl account:** 3 years after the last time you use Our Services or the last login.
- **Prospecting Information** : 3 years after the last time We were in contact with you
- **Information about traffic on Our Services:** 12 months after it is collected, in accordance with applicable law.
- **Statistics collected:** maximum 25 months (anonymisation).

Beyond this period, some business Information can be archived for longer periods outside of Our active database, specifically for evidence-related purposes during the applicable statute of limitations (5 years for civil and commercial actions), as well as for accounting purposes (10 years from the date of the documents).

8. Who has access to my Information?

Other GLOWBL Users:

When you communicate publicly on a Space with other Glowbl users, they will be able to access your Public Information (your name, your public messages, your voice and your image when you intervene on a Space, etc.)

You can control your Information visible to all in your profile: [Account \(glowbl.com\)](https://glowbl.com).

The Administrator:

When an Administrator invites you to access his Space, he is the recipient of some of your Information concerning your user profile and Space Data, such as the connection logs in his Space.

The Administrator is solely responsible for the treatment he carries out with your Information. For more information, see our section "2. When does this Privacy Policy not apply?" "

Our Staff:

The various Glowbl teams access some of your Information according to the needs of their missions..

Our Technical Service Providers:

The host provider of our Site, the publisher of our customer management software and our tool for sending emails, are service providers to whom we communicate some of your Information.

To Regulatory and Judicial Authorities:

If the law requires us to do so, we may need to communicate some of your information to the authorities.

9. Where is my Information stored?

Your Information is mainly hosted in the European Union:

Recipient	Host Region
Amazon Web Services : Hosting our technical infrastructure	Europe: Datacenters in Paris and Frankfurt
Matomo : For Site / Application traffic statistics	Europe: AWS Data Centers in Dublin and Frankfurt
HubSpot : For the management of our customers and our marketing actions and the sending of our emails	Europe & USA : AWS Datacenter in Eastern US or Germany

Some of our service providers may host Information outside the European Union; these transfers are then made with the appropriate guarantees provided for by law.

It is:

Recipient	Guarantee taken
HubSpot : For the management of our customers and our marketing actions and the sending of our emails	European Commission standard contractual clauses https://knowledge.hubspot.com/fr/account/hubspot-cloud-infrastructure-and-data-hosting-frequently-asked-questions

10. How do I opt out of website tracking?

To measure the audience on our site and understand the behavior of our visitors and users, we use the Matomo Analytics tool, [in its configuration recommended by the CNIL](#) **without cookies or consent**, the data being anonymized.

You can object to the tracking of your browsing on our website. This will protect your privacy, but also prevent us from learning from your actions and creating a better experience for you and other users.

To do this, please uncheck the box [on this page](#).

11. Do you use cookies?

Yes, there are several reasons that We use cookies and tracking files on Our Website and Our Application.

Technical Cookies: They are necessary for the proper functioning of the Site or the Application and cannot be refused.

Audience

Measurement

and analysis Cookies:

We use these cookies so that We can better understand the way you use Our Services, the features you use most often, etc.

Advertising

Marketing Cookies:

We do not use a tracer of this type.

You will find below the list of cookies we use:

Category	Publisher	Cookie name	Purpose	Cookie lifetime	Learn more
Technical cookies on account.glowbl.com	Glowbl	sid	Technical cookie strictly necessary for the operation of the platform	session	
		xsrft		session	
		stok		session	
		sst		session	
Technical cookies on www.glowbl.com and explore.glowbl.com	Glowbl	pll_language	Choice of language	12 months	
	HubSpot				https://knowledge.hubspot.com/fr/articles/kcs/article/reports/what-cookies-does-hubspot-setting-a-visitor-sbrowser
Audience Measurement and analysis cookies on www.glowbl.com , explore.glowbl.com	HubSpot		These are non-essential cookies managed by the cookie banner		https://knowledge.hubspot.com/fr/articles/kcs/article/reports/what-cookies-does-hubspot-setting-a-visitor-sbrowser

12. How can I prevent the use of cookies?

Technical cookies are essential for the operation of our site and our platform, so it is not possible to deactivate them.

You can object to the use of other cookies by indicating your preferences [in our settings tool](#).

13. What rights do I have?

You have several rights to your Information that we hold:

The right to access:	You can ask Us for access to all of the Information about you in Our possession.
The right to rectification:	You can ask Us to correct your Information. More often than not, you can correct your Information yourself by connecting to the Application or the Website or by writing to contact@glowbl.com
The right to object:	You can ask Us to stop using your Information when We are not doing so for a legitimate interest. You can also ask Us to stop sending you prospecting/direct marketing messages. You can do so easily by clicking on the link at the bottom of the emails We send or by writing to contact@glowbl.com .
The right to withdraw consent:	When you have granted your consent for your Information to be used for a specified purpose, you are entitled to withdraw your consent at any time. If you do, We will stop using your Information for the purpose in question. You can do so by writing to contact@glowbl.com .
The right to deletion:	You can ask Us to delete or stop using your Information.
The right to limitation:	You can ask Us to block the use of your Information—that is, to store it temporarily but to stop using it.
The right to data portability:	You can export your Information in a reusable format, or, when it is feasible, ask Us to transfer it to another company who can reuse it.
The right to file a complaint:	You can file a complaint with the Data Protection Authority (in France, the CNIL www.cnil.fr) at any time if you feel that your rights have not been respected.
The right to organize the fate of data after death	You can give us instructions relating to the retention, deletion and communication of your Information after your death. These directives may be general (when they concern all of your Information) or specific (when they concern only certain processing).

14. How can I exercise my rights?

To exercise your rights, contact Us using the contact information provided in the Article “How can I contact you?”.

Please note that We can only answer questions or requests to exercise rights that concern this Policy. For further information, see Section “2. When does this Privacy Policy not apply?”.